

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

KARREM NASR,  
a/k/a "Ghareeb Al-Muhajir,"

Defendant.

INDICTMENT

24 Cr.

24 CRIM 019

COUNT ONE

**(Attempted Provision of Material Support and Resources to a Designated Foreign  
Terrorist Organization)**

The Grand Jury charges:

1. From at least in or about July 2023, up to and including in or about December 2023, in Egypt, Kenya, and elsewhere, and in an offense begun and committed out of the jurisdiction of any particular State or district of the United States, KARREM NASR, a/k/a "Ghareeb Al-Muhajir," the defendant, who was first brought to and arrested in the Southern District of New York, knowingly and intentionally attempted to provide "material support or resources," as that term is defined in Title 18, United States Code, Section 2339A(b), including personnel and services, to a foreign terrorist organization, to wit, al Shabaab, which at all relevant times has been designated by the U.S. Secretary of State as a foreign terrorist organization, pursuant to Section 219 of the Immigration and Nationality Act ("INA"), and is currently designated as such as of the date of the filing of this Indictment, knowing that al Shabaab was a designated foreign terrorist organization (as defined in Title 18, United States Code, Section 2339(B)(g)(6)), that al Shabaab engages and has engaged in terrorist activity (as defined in Section 212(a)(3)(B) of the INA), and that al

Shabaab engages and has engaged in terrorism (as defined in Section 140(d)(2) of the Foreign Relations Authorization Act, Fiscal Years 1988 and 1989).

(Title 18, United States Code, Sections 2339B, 3238, and 2.)

**FORFEITURE ALLEGATION**

2. As a result of planning and perpetrating a Federal crime of terrorism against the United States, as defined in Title 18, United States Code, Section 2332b(g)(5), and as alleged in Count One of this Indictment, KARREM NASR, a/k/a “Ghareeb Al-Muhajir,” the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(G) and Title 28, United States Code, Section 2461:

- a. All right, title, and interest in all assets, foreign and domestic;
- b. All right, title, and interest in all assets, foreign and domestic, acquired and maintained with the intent and for the purpose of supporting, planning, conducting, and concealing a Federal crime of terrorism against the United States, citizens and residents of the United States, and their property; and
- c. All right, title, and interest in all assets, foreign and domestic, derived from, involved in, and used and intended to be used to commit a Federal crime of terrorism against the United States, citizens and residents of the United States, and their property; including but not limited to a sum of money representing the value of the property described above as being subject to forfeiture.

**Substitute Assets Provision**

3. If any of the above-described forfeitable property, as a result of any act or omission of KARREM NASR, a/k/a “Ghareeb Al-Muhajir,” the defendant:

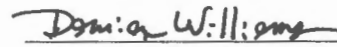
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;

- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty,

it is the intent of the United States, pursuant to Title 28, United States Code, Section 2461, to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 981(a)(1)(G) and 2332b(g)(5); and  
Title 28, United States Code, Section 2461.)

 (DFP)  
FOREPERSON

  
DAMIAN WILLIAMS  
United States Attorney